

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CAA SPORTS LLC,

Petitioner,

-v.-

BEN DOGRA

Respondent.

CASE NO. 4:18-cv-01887

MOTION TO SEAL

Pursuant to Local Rule 83-13.05, Petitioner CAA Sports LLC (“CAA”), by and through its undersigned counsel, hereby moves to seal: (1) its Petition to Vacate the Fourth Supplemental Opinion and Award (“Fourth Supplemental Award”), including Exhibit A to the Petition; (2) its Motion to Vacate the Fourth Supplemental Award; and (3) Exhibit A to its Motion to Vacate Fourth Supplemental Award. For the reasons set forth below, good cause exists to seal the aforementioned documents to protect the confidentiality of the arbitration between the parties.

1. On November 5, 2018, CAA filed its Petition to Vacate and Motion to Vacate the Fourth Supplemental Award issued in the arbitration between CAA and Ben Dogra (“Dogra”).

2. Pursuant to the Employment Agreement governing the dispute between the parties, all arbitration between the parties shall be confidential.

3. The Petition to Vacate and Exhibit A to the Petition to Vacate, Motion to Vacate and Exhibit A to the Motion to Vacate, each contain details of the arbitration between the parties, which are necessary to the adjudication of this matter by this Court, but are contractually obligated to remain confidential.

4. To allow CAA to protect its rights under the Federal Arbitration Act while simultaneously respecting the agreed confidentiality of the arbitration proceedings, this Court should seal the requested documents by entering the attached Proposed Order.

WHEREFORE, CAA respectfully requests that this Court grant its Motion to Seal and permit it to file its Petition to Vacate and Exhibit A to its Petition to Vacate, Motion to Vacate and Exhibit A to its Motion to Vacate under seal.

Dated: November 5, 2018

Respectfully submitted,

/s/ Charles B. Jellinek

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Counsel for Petitioner CAA Sports LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this 5th day of November, 2018, I caused a copy of the foregoing to be filed electronically with the Court and will cause it to be served in accordance with applicable law on the parties listed below.

Ben Dogra
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/s/ Charles B. Jellinek
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